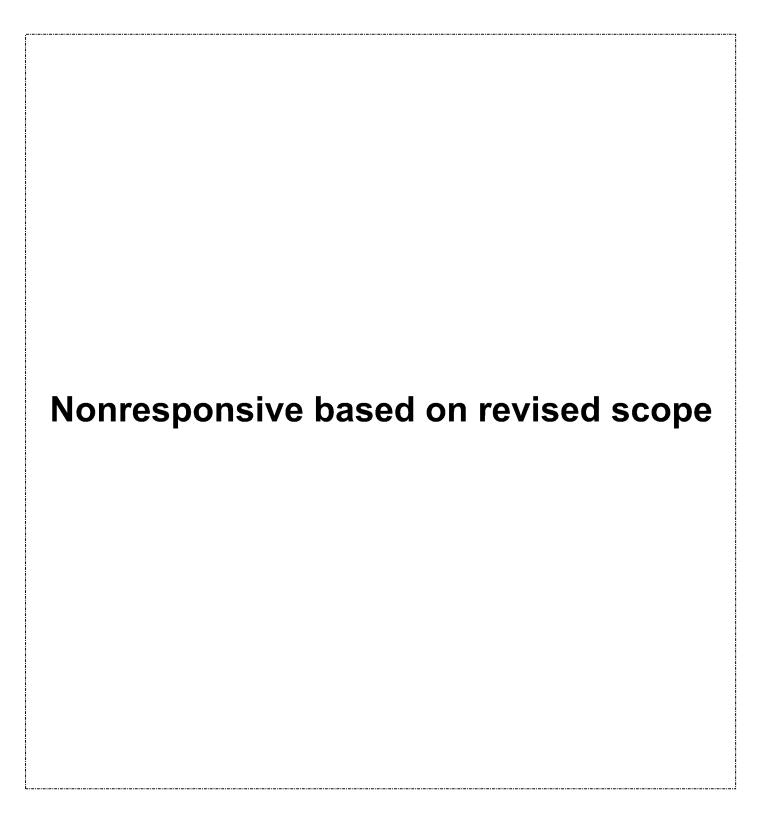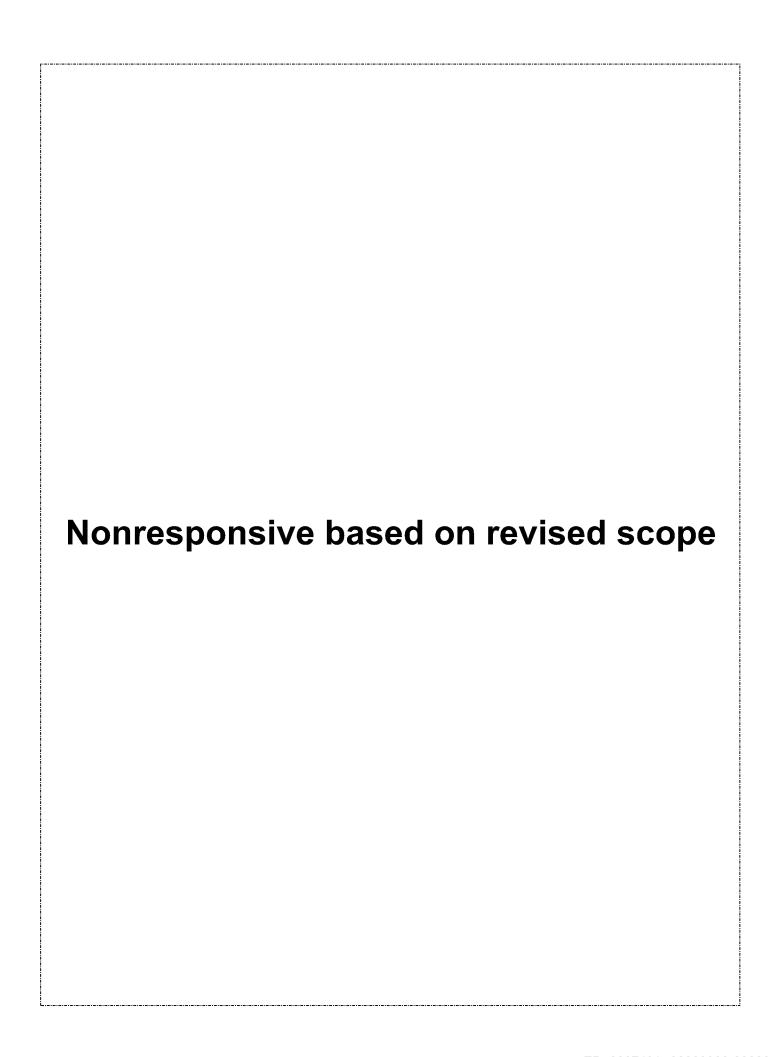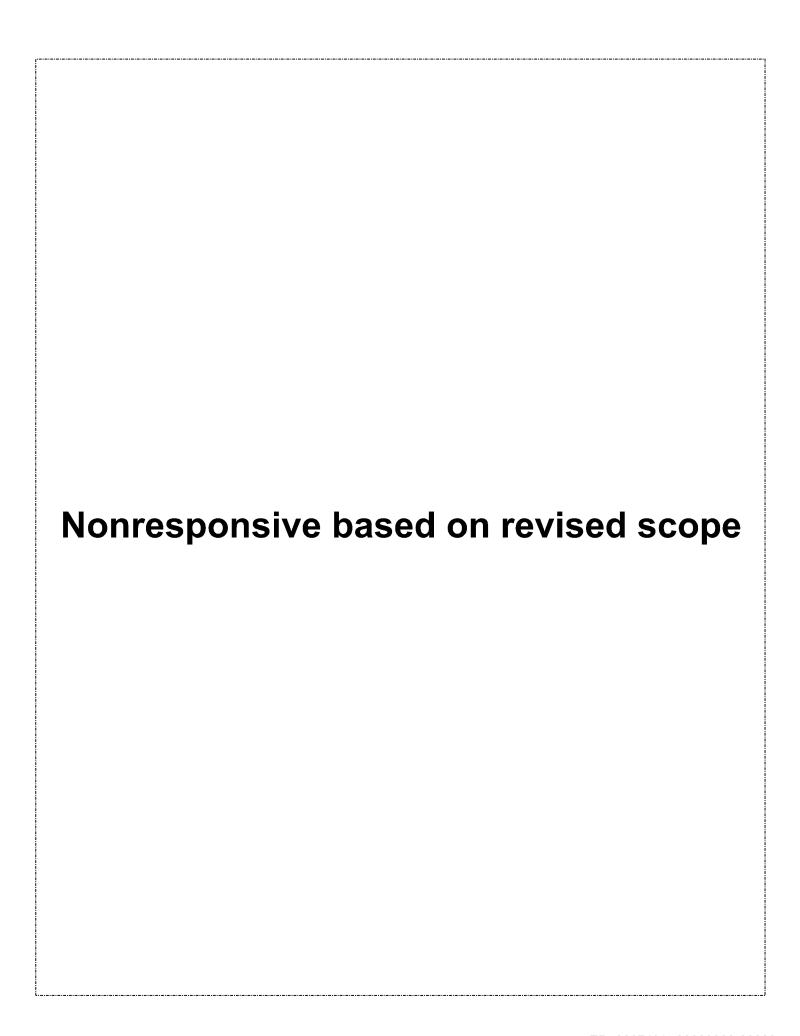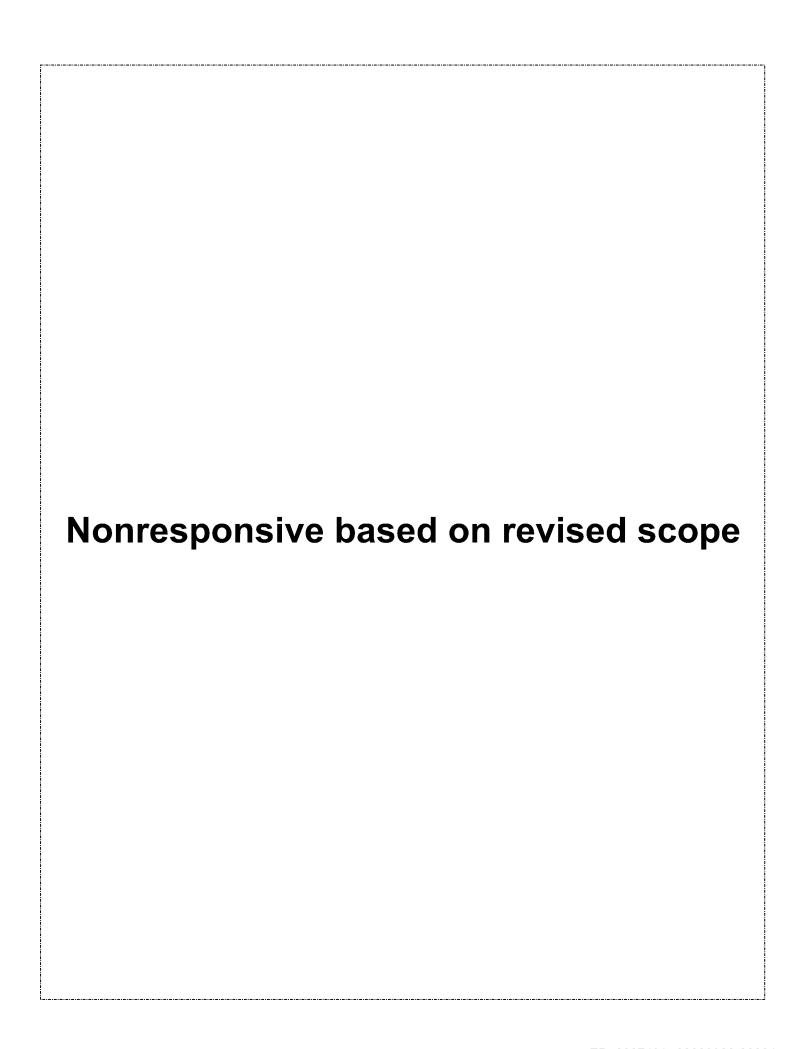**RA Call with PADEP Secretary McDonnell**
Monday, March 1, 2021

<u>**Talking Points**</u>

Nonresponsive based on revised scope

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WATER DIVISION

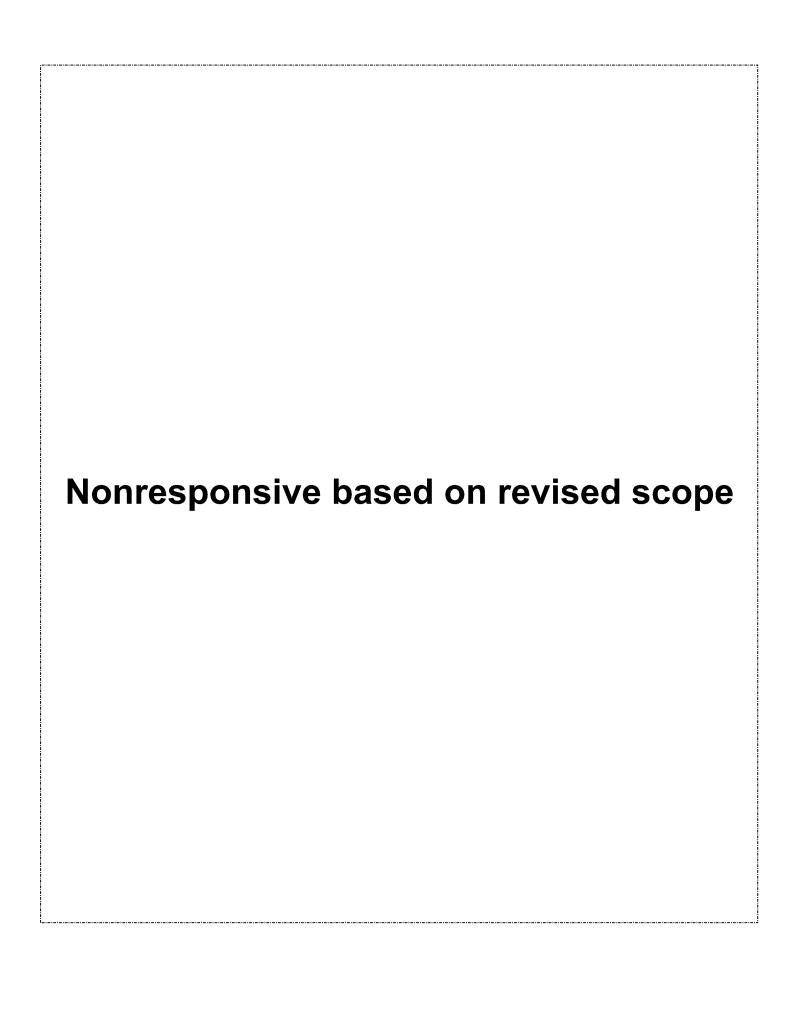**Nonresponsive based on revised scope**

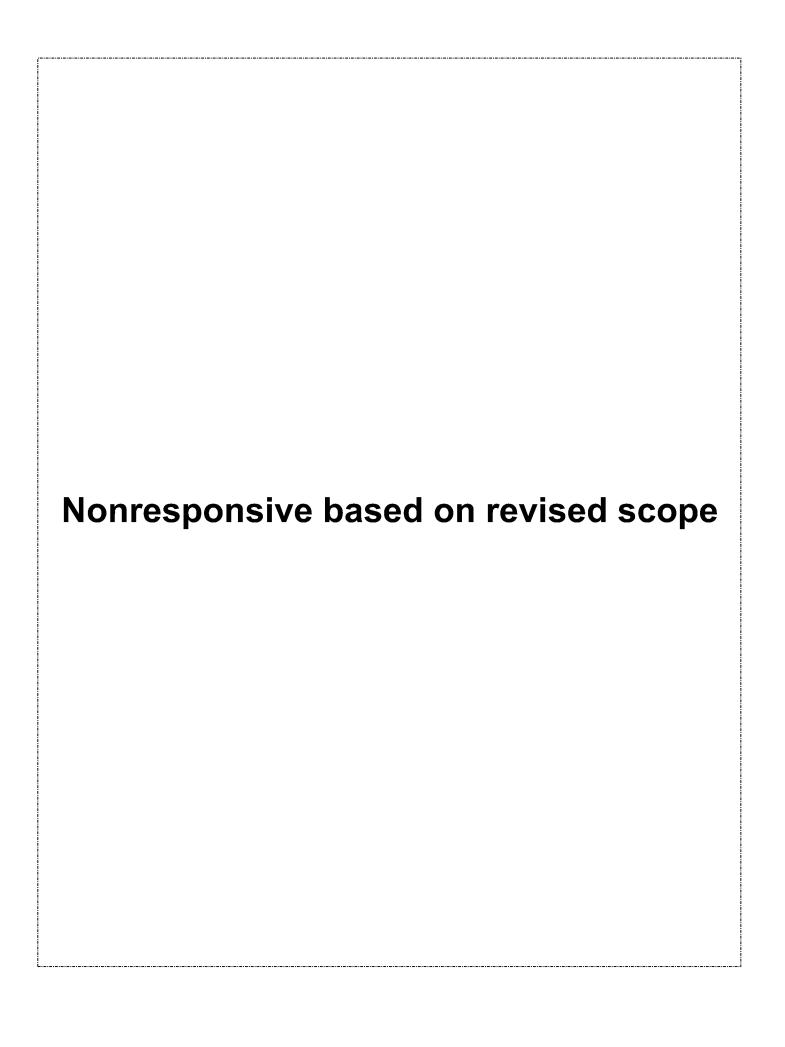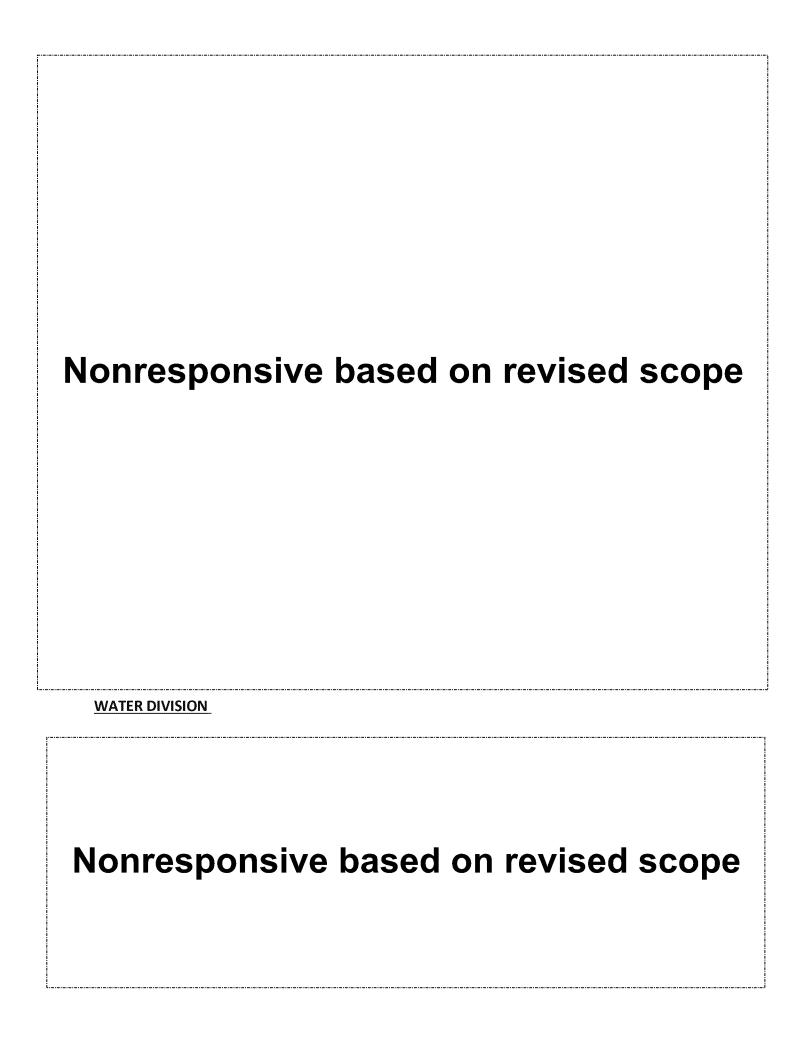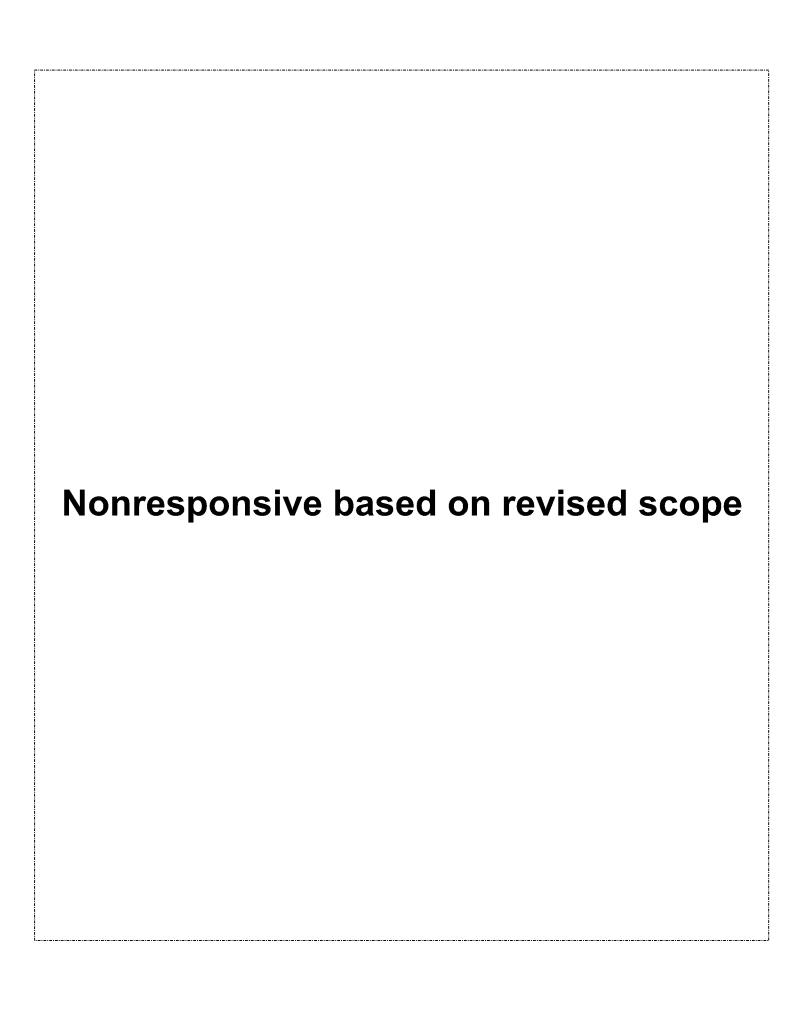**Nonresponsive based on revised scope**

Nonresponsive based on revised scope

Underground Injection Permit Actions

- **Permit Issuance Delays as a Result of Tribal**
    - EPA permitting actions require consultation with tribal nations if the activity may affect their interests. The consultation process introduces another step in the permit issuance process which can be resource intensive.
    - The UIC program has not had extensive consultations in the past, but the Seneca nation has expressed a desire to consult on permits that may affect tribal aboriginal lands. This originally encompassed the entire Allegheny watershed.
    - EPA has sought in discussions with the Seneca Nation to clearly identify areas of concern. Discussions have indicated that disposal wells in the upper Allegheny watershed are of primary concern.

Nonresponsive based on revised scope

Nonresponsive based on revised scope

- **Roulette UIC Permit**
  - Roulette draft permit was public notice on December 31,2020.
  - The public comment period was extended until April 5th per Clara Townships request for a 30-day public comment extension
  - EPA entered the consultative process with the Seneca Nation and continues to consult with them.

- **Sandstone Development** submitted an application for a UIC enhanced recover permit to EPA. A consultative letter is currently being prepared for concurrence to send to Seneca Nation and the permit is currently being drafted.

- **Bull Run Resources Draft UIC Permit** for enhanced recovery permit has been finalized. Seneca Nation declined offer for consultation. Public Notice of Draft Permit scheduled for April 8th and public hearing if requested is scheduled for May 11th.

- **Catalyst Energy Draft UIC Permit** for a disposal well been prepared by technical staff. EPA has entered the consultative process with Seneca Nation and continues to converse with them.